

UNITED STATES DISTRICT COURT
for the Northern Mariana Islands District

FILED
Clerk
District Court

JUL 23 2024

Zaji O. Zajradhara,
Plaintiff,

for the Northern Mariana Islands
By JP
(Deputy Clerk)

-v-

Case Number #

CV - 24 - 00011

A. Amer Younis,
B. Younis Art Studio, Inc. (dba) Mariana Variety News & Views,
C. Bryan Manabat,
Defendants.

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff

Name: **Zaji O. Zajradhara**
Street Address: P.O. BOX 506141, SAIPAN, MP 96950
City and County: Saipan, MP 96950
State and Zip Code: MP 96950
Telephone Number: 670-233-0101
E-mail Address: Zajiversal@yahoo.com

B. The Defendants

Defendant No. 1:

Name: **Amer Younis**
Job or Title (if known): President/Managing Officer, Mariana Variety News & Views
Street Address: Alaihal Avenue, Garapan, Saipan, MP 96950
City and County: Saipan, MP 96950
State and Zip Code: MP 96950
Telephone Number: (670) 234-9272
E-mail Address (if known): Editor@mvariety.com (amier@mvariety.com)

Defendant No. 2:

Name: **Younis Art Studio, Inc. (dba) Mariana Variety News & Views**

Job or Title (if known): [Please provide information if available]

Street Address: Alaihal Avenue, Garapan, Saipan, MP 96950

City and County: Saipan, MP 96950

State and Zip Code: MP 96950

Telephone Number: (670) 234-9272

E-mail Address (if known): N/A

Defendant No. 3:

Name: **Bryan Manabat**

Job or Title (if known): Journalist, Mariana Variety News & Views

Street Address: Alaihal Avenue, Garapan, Saipan, MP 96950

City and County: Saipan, MP 96950

State and Zip Code: MP 96950

Telephone Number: (670) 234-9272

E-mail Address (if known): bryan@mvariety.com

II. Basis for Jurisdiction

Federal Question: This case arises under the United States Constitution, specifically the First Amendment's protection of free speech, the Fourteenth Amendment's protection against state action that deprives individuals of their rights, and 42 U.S.C. § 1983, which provides a cause of action for deprivation of rights under color of state law. The Plaintiff hereby requests (a): **Bench Trial**

Diversity of Citizenship: Plaintiff is a citizen of the United States, residing in the CNMI. Defendant No. 1 is a citizen of the CNMI. Defendant No. 2 is incorporated in the CNMI. Defendant No. 3 is a citizen of the CNMI. The amount in controversy exceeds \$75,000.

III. Statement of Claim

A. Where did the events giving rise to your claim(s) occur?

The events giving rise to the claims occurred primarily in the CNMI, specifically where Mariana Variety News & Views publishes and distributes its news articles.

B. What date and approximate time did the events giving rise to your claim(s) occur?

The events giving rise to the claims occurred over a period of time, beginning on or around **2017-2018** and continuing to the present date. It is important to note that Mariana Variety News & Views has erased many articles from its website, making it difficult to pinpoint exact dates and times. However, Plaintiff intends to rely on archived copies of the articles, as well as other evidence, to establish the timeline of the Defendants' actions.

C. What are the facts underlying your claim(s)?

Defamatory Articles: Plaintiff alleges that Defendants, through Mariana Variety News & Views and its journalist Bryan Manabat, have published a series of false and defamatory articles about him. These articles falsely accused Plaintiff of criminal activity, dishonesty, and a lack of professional competence, often citing the CNMI Legislature's "persona non-grata" resolution without proper context. They also misrepresented his past arrests and convictions, failing to provide context or exploration of potential rehabilitation. These articles have been published consistently over several years, demonstrating a pattern of malicious intent.

Conflict of Interest: Plaintiff further alleges that Defendant Bryan Manabat, a member of the United Filipino Organization (UFO) or Similar Group made up of primarily Imported CW-1 workers of Filipino Non-Indigenous American Citizenry or Similar grouping of Primarily Non-American individuals(** for all "UFO" cites) :, has a clear conflict of interest that undermines his journalistic integrity. The UFO is a politically motivated organization with goals that are directly opposed to Plaintiff's advocacy for American workers' rights and fiscal responsibility in the CNMI.

Malicious Intent: Plaintiff asserts that Manabat's reporting is part of a malicious campaign by the UFO to silence Plaintiff's advocacy and to damage his reputation. The articles consistently prioritize official statements, overlooking Plaintiff's perspective, and utilize loaded language and discriminatory tropes. This pattern suggests a calculated effort to shape public perception in favor of the UFO and against Plaintiff. Plaintiff has also presented evidence that Defendant Manabat actively ignored his requests to cease and desist from publishing these articles.

Reputational Harm and Loss of Employment: Plaintiff provides evidence that the negative media coverage from Marianas Variety directly harmed his employment opportunities, as prospective employers explicitly cited the negative media coverage as the reason for not hiring him.

Retaliation for Exercising First Amendment Rights: Plaintiff argues that the continued publication of defamatory articles after his requests to cease and desist can be interpreted as retaliation for exercising his First Amendment rights to criticize the CNMI government and its policies. He specifically highlights how the articles, particularly those focusing on the "persona non-grata" resolution, attempt to discredit his advocacy and portray him as a troublesome individual.

IV. Irreparable Injury

Plaintiff argues that monetary damages at a later time would not adequately compensate him for the injuries he has sustained, is sustaining, and will continue to sustain as a result of the Defendants' actions. The harm to his reputation and the loss of employment opportunities are not easily quantifiable and have caused significant emotional distress. Further, the continued publication of defamatory articles presents a threat to his future livelihood and prevents him from fully exercising his First Amendment rights. The damage to his reputation is ongoing and cannot be fully rectified by financial compensation.

V. Relief

Plaintiff requests the following relief:

Injunctive Relief: An injunction ordering Defendants to immediately cease and desist from publishing any further false and defamatory statements about Plaintiff. This injunction should also require the removal of all existing articles and images related to Plaintiff from the publication and online platforms, as well as the issuance of a public retraction and apology for the false and damaging statements made against him.

Compensatory Damages: Actual damages in an amount of **\$100,000,000.00 (ONE HUNDRED MILLION DOLLARS)** for the harm to Plaintiff's reputation, loss of employment opportunities, and emotional distress.

Punitive Damages: Punitive damages in an amount to be determined by the Court to deter Defendants from engaging in similar conduct in the future.

Attorneys' Fees and Cost: Recovery of attorneys' fees and costs incurred in bringing this action. N/A:

VI. Certification and Closing

I, Zaji O. Zajradhara, Plaintiff, certify that to the best of my knowledge, information, and belief, this Complaint:

(1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;

(2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law;

(3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and

(4) the Complaint otherwise complies with the requirements of Rule 11.

Date of signing: [Date]

Signature of Plaintiff: [Please add Plaintiff's signature]

Printed Name of Plaintiff: Zaji O. Zajradhara

